

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

LEON FOY#125322  
PLAINTIFF,

\*

V.

\*

BOB RILEY, ET AL, .  
DEFENDANT[S]

\* CIVIL ACTION NO:2:05-CV-946-F

\*

AFFIDAVIT

STATE OF ALABAMA

ELMORE COUNTY

BEFORE ME, THE UNDEERSIGNED AUTHORITY, A NOTARY PUBLIC, IN AND FOR  
SAID COUNTY AND STATE OF ALABAMA AT LARGE, PERSONALLY APPEARED ~~TERRANCE~~  
~~CULLIVER~~ WHO BEING KNOWN TO ME AND BEING BY ME FIRST DULY SWORN, DEPOSES  
AND SAYS ON OATH AS FOLLOWS;

THE AFFIDAVIT IS SUBMITTED BY TERRANCE CULLIVER#173861, A INMATES  
HOUSED AT ELMORE CORRECTIONAL FACILITY. I AM OVER THE AGE 21. I AM  
ASSIGNED TO WORK IN THE KITCHEN AT ELMORE CORRECTIONAL FACILITY AND  
HAVE BEEN FOR SEVEN(7) MONTHES. MY JOB IS KEEPING THE FLOORS CLEAN.  
THE KITCHEN FACILITIES AND EQUIPMENT IS OBSOLETE AND UNSANIARY.  
THE COOKING EQUIPMENT IS ODL AND OUTDATED AND POORLY MAINTAINED.  
THE DISHWASHER LEAKS WATER ON THE FLOOR IN THE DISHROOM CREATING  
A SAFETY HAZARD FOR THOSE WORKING IN THE DISHROOM AND MAIN KITCHEN  
AREA. FLOOR DRAINS BARELY FUNCTION AND STANDING POOLS OF WATER ARE COMMON,  
I HAVE SEEN(WITNESSED) TWO INMATES SLIP AND FALL.  
INMATES WORKERS ARE NOT GIVEN BASIC INSTRUCTION OF FOOD PROTECTION  
AND FOOD SANITATION. POOLS OF WATER ARE ALSO CONSTANTLY STANDING IN  
THE STORAGE COOLERS. FOOD STORAGE SHELVES ARE SOILDED WITH DIRT .  
THE ABOVE INFORMATION IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.

Terrance Culliver 173861  
TERRANCE CULLIVER#173861

STATE OF ALABAMA

ELMORE COUNTY

SWORN TO AND SUBSCRIBED BEFORE ME AND GIVEN UNDER MY HAND AND OFFICIAL  
SEAL THIS THE 18<sup>th</sup> DAY OF Jan, 06

[Signature]  
NOTARY PUBLIC

April 5, 2008  
MY COMMISSION EXPIRES: